

CALFRESH (CF) PROGRAM

REQUEST FOR POLICY/REGULATION INTERPRETATION

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	5. DATE OF REQUEST:	NEED RESPONSE BY:
2. REQUESTOR NAME:	6. COUNTY/ORGANIZATION: Butte	
3. PHONE NO.:	7. SUBJECT: Work Study and Eligible Students/Mid Period	
4. REGULATION CITE(S): 63-406..1, .2; 63-300.5(a)(2), 63-502.137, 63-507(a)(6)	8. REFERENCES: <i>(Include ACL/ACIN, court cases, etc. in references)</i> NOTE: All requests must have a regulation cite(s) and/or a reference(s). ACIN I-89-15; ACL 17-05	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

There is conflicting information concerning the eligible student status of students participating in work study, and if action can be taken mid period and for what reason.. If a student is deemed eligible based on their participation in work study, can they be terminated during summer break when they are no longer participating in work study, even if it is mid-period? If student status is not a mandatory mid-period report, would a person getting work study be able to be discontinued at the end of the school year/work study job, if this falls during the middle of their certification period?

If a student participating in work study applies for CalFresh in March, and the school year ends in May, along with their work study job, would the worker then be required to follow up in May to discontinue if no other exemptions applied, even though this is mid-period?

10. REQUESTOR'S PROPOSED ANSWER:

Unclear. Response to policy interpretation dated 7/27/16 from Yolo County states that once eligibility for a student has been established with an exemption, that exemption will continue through the certification period (63-406.21). However, it also goes on to state that work study is the exception to the rule and that the exemption ends the month the school term ends, and that it will not continue between terms when there is a break of a full month or longer if the student is not participating in work study. What if the end of the school term occurs mid-period?

11. STATE POLICY RESPONSE (CFPB USE ONLY):

Per ACL 17-05, Page 7: An exception to the general rule applies to the work study exemption. This exemption begins the month the school term starts or the month work study is approved, whichever is later. The exemption continues until the end of the month that the school term ends, or it becomes known that the student refused a work assignment. The exemption shall not continue between terms when there is a break of a full month or longer, unless the student is participating in work study during the break. CWDs are reminded to assess whether a student, who is not participating in work study during the break, meets the criteria for another exemption before taking action to discontinue their CalFresh eligibility.

To clarify, even if it is mid-period, and the CWD has determined that the work study has ended and the student does not qualify for additional exemption(s), the CWD must discontinue their CalFresh eligibility due to the special circumstance

FOR CDSS USE

DATE RECEIVED: 07/24/2017	DATE RESPONDED TO COUNTY/ALJ: 08/08/2017 AB
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